

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

BRITTANY WATTS	)	
	)	
	)	
Plaintiff,	)	
	)	Case No. 4:25-cv-00049
v.	)	
	)	
BON SECOURS MERCY HEALTH;	)	Hon. Judge Sara Lioi
MERCY HEALTH YOUNGSTOWN	)	
LLC D/B/A ST. JOSEPH WARREN	)	
HOSPITAL; <i>et al.</i> ,	)	JURY TRIAL DEMANDED
	)	
Defendants.	)	

**PARTIES' JOINT STATUS REPORT**

Pursuant to this Court's order, Doc. 17, Plaintiff Brittany Watts, and Defendants Bon Secours Mercy Health, St. Joseph Warren Hospital, Connie Moschell, Jordan Carrino, Parisa Khavari, Nicholas Carney, and the City of Warren, Ohio (collectively referred to as "the parties"), submit this joint status report:

**I. Discovery**

The parties exchanged initial disclosures in April 2025. On May 27, 2025, Plaintiff served requests to produce documents and interrogatories on all Defendants. On June 10, 2025, Plaintiff served a second round of written discovery requests, including requests for admission, on Defendants Bon Secours Mercy Health and St. Joseph Warren Hospital. Plaintiff expects to begin depositions once she receives Defendants' discovery responses.

**II. Motions**

Currently there are no motions pending. Because this case includes claims based on the alleged failure to provide proper medical care and to properly protect Plaintiff's medical

information, Plaintiff anticipates that her medical records will need to be obtained and produced in this case. Accordingly, Plaintiff intends to file a motion for the entry of a qualified protective order to protect Plaintiff's health information. Defendants submit that the proposed protective order is redundant and unnecessary.

### **III. Reasons to Deviate from the Case Management Plan and Trial Order**

Currently there are no case developments that require deviation from the case management plan and trial order.

### **IV. Settlement Discussions**

Prior to filing this case, Plaintiff and counsel for Bon Secours Mercy Health and St. Joseph Warren Hospital engaged in an unsuccessful mediation. Since then, the parties have not had any additional settlement discussions.

RESPECTFULLY SUBMITTED:

/s/ Jillian Eckart

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**CERTIFICATE OF SERVICE**

I, Renee Spence, hereby certify that on June 12, 2025, a true and correct copy of the foregoing has been served via CM/ECF to all counsel of record.

/s/ Renee Spence  
*One of Plaintiff's Attorneys*